

November 1, 2019

Jennifer and John Flach

616 Charles Drive

Gilbertsville, Pa 19525

To Whom It May Concern:

I am submitting a response to the request for relief from automatic stay filed by the mortgage company, PNC Bank. Therefore, we are requesting that the Court not grant the hearing is not necessary for the following reasons: Relief as payments have been made current.

I have made the mortgage payments for the dates listed and have paid the requested amounts.

The request for relief states August-October, 2019 were not paid. I have made the payments directly to PNC. I do not pay the full monthly \$1494 in one payment, but break it up over the course of the month which I have been advised by PNC I am allowed to do while in Bankruptcy.

I received a statement from PNC Mortgage in October, indicating that my August payment had been applied to the account.

The September and October payments have also been made in full as well and I have listed confirmation numbers below that I received from the bank when I made the phone payments.

Also, my bankruptcy payments to the TFS were scheduled to begin with payments of \$1040 which are withdrawn from account automatically bi-weekly in the amount of \$520.00 for a total of \$1040 per month.

If there is additional information needed my contact # 484-587-9631

Thank You,

Jennifer Flach



PNC payments

June 2019: 6/28 \$1495.

July 2019: \$300, \$500, \$700 = \$1500.

August 2019: \$600, \$200, \$200 = \$1500.

Sept 2019: \$530, \$470 = \$1500. # 213 027 67

Oct 2019 - \$1495.

PNC has confirmed these payments with me.

**LOCAL BANKRUPTCY FORM 9014-3
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Jennifer Megan Flach fka Jennifer Megan
Lavella
John William Flach

Debtors

CHAPTER 13

PNC BANK NATIONAL ASSOCIATION

Movant

NO. 19-13239 ELF

vs.

Jennifer Megan Flach fka Jennifer Megan Lavella
John William Flach

Debtors

11 U.S.C. Section 362

William C. Miller Esq.

Trustee

**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

PNC BANK NATIONAL ASSOCIATION has filed a Motion for Relief from Stay, with the court for Relief from the Automatic Stay of Section 362.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. * If you do not want the court to grant the relief sought in the motion, then on or before November 5, 2019 you or your attorney must do all of the following:

- (a) file an answer explaining your position at:
United States Bankruptcy Court
Robert N.C. Nix Building
900 Market Street, Suite 400
Philadelphia, PA 19107-4299

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to movant's attorney:
Rebecca A. Solarz, Esquire
KML Law Group, P.C.
Suite 5000 - BNY Mellon Independence Center
701 Market Street
Philadelphia, PA 19106-1532

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank, the United States Bankruptcy Judge, in Courtroom No. 1 at the United States Bankruptcy Court, Robert N.C. Nix Building, 900 Market Street, Suite 400, Philadelphia, Pa. 19107-4299 on November 19, 2019, at 9:30 a.m., or as soon thereafter as counsel can be heard, to consider the motion.



4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

/s/Rebecca A. Solarz, Esquire

Rebecca A. Solarz, Esquire

KML Law Group, P.C.

701 Market Street, Suite 5000

Philadelphia, PA 19106-1532

Phone: (215) 627-1322 Fax: (215) 627-7734

Attorneys for Movant/Applicant

October 22, 2019

